



California High-Speed Rail Authority 925 L Street, Suite 1425 Sacramento, CA 95814

RE: Draft Bay Area to Central Valley Program EIR/EIS Comments

Dear Chairman Kopp and Members of the Authority:

The Sierra Club appreciates the opportunity to comment on the Bay Area to Central Valley HST DEIR/S. This letter is a supplement to our detailed comments on the Draft Program EIR/S being submitted jointly with other environmental and rail transit advocacy groups, which we incorporate by reference.

O017-1

The Sierra Club has long been supportive of the concept of high-speed rail, particularly as an alternative to airport expansion. See for example long/HighSpeedRail.html and www.sierraclub.org/sprawl/transportation/highspeedrail.asp. The Club chose to highlight the California High-Speed Rail project as one of 49 worthy transportation projects nationally in our "Smart Choices, Less Traffic" report of 2002. See www.sierraclub.org/sprawl/report02/.

It is our hope that the HSR system can be built in a manner that complements the Sierra Club's top priorities goals including: Smart Energy Solutions - combating greenhouse gas emissions and climate change; Safe and Healthy Communities, and preserving America's Wild Legacy. As such, we think the HSR project can help California shift future demand for long-distance transportation to more energy-efficient modes and is less-polluting than new airport or highway expansions. And, we note that there is much greater potential for trains to be powered with renewable energy than there is for airplanes. In addition, we're concerned that proposed airport expansions would result in thousands of acres of fill being added to San Francisco Bay and significantly and adversely affect neighborhoods in the Los Angeles area. High-speed rail would provide an alternative to such airport expansions, reduce greenhouse gas emissions, and promote urban infill through smartly

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O017-2

Nonetheless we have significant concerns about the important detail of how high-speed rail will connect the Bay Area and the Central Valley. We are concerned that serious flaws in the Draft Program EIR/S do not make clear the significant differences in environmental impacts between the Altamont and Pacheco alternatives, which make it extremely difficult for decision-makers and the public to assess the alternatives. Particularly egregious is the obfuscation of alternatives, through descriptions that are not consistent between sections, figures, and tables. And, there are incomplete and almost "in passing" references in the document to federal and state lands that each alternative traverses or is adjacent to, and a near-complete omission of these important lands and boundaries from the maps provided. This makes it very difficult to assess the potential biological and 4(f)/6(f) impacts

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O017-4

designed stations.

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posed by the HSR project. We understand that the approach to analyzing the project and that the development of transportation segments for modeling purposes was complicated by the requirements of the Bay Area Regional Rail Plan Study. However, the omission of such basic information about these parks and lands is not acceptable.

O017-4 Cont.

Throughout the impacted territories of the Sierra Club, we are unanimously of the opinion that the Altamont alignments for high-speed rail are environmentally preferable to the Pacheco alignments, and we are disappointed that the severely flawed Draft Program EIR/S does not make clear the environmental differences between the two key alignments. High-speed rail in the Pacheco alignment would impact larger areas of wilderness which are relatively untouched and which would be more radically altered by the noise and infrastructure that high-speed rail would introduce.

O017-5

Our environmental allies who work on restoration of the San Francisco Bay have also expressed to us that a new bay crossing could actually present an opportunity to reverse some of the historical impacts to the Bay and the Don Edwards San Francisco Bay National Wildlife Refuge. They are also anxious about the continuing pressures to expand SFO airport runways into the bay.

The Club also believes it is important for the future viability of high-speed rail to have a first phase that serves the population in the upper San Joaquin Valley and Livermore Valley and to provide synergy with needed improvements to regional rail services along this corridor to San Jose and across the Dumbarton corridor. The Altamont route will also make the reality of serving the State Capitol, Sacramento, and this growing area with high-speed rail much more likely in the near term.

O017-6

Again, we appreciate the opportunity to comment and urge the Authority to revise and recirulate the environmental documents to address the serious concerns outline in detail in the referenced longer comment letter.

O017-7

Sincerely,

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